Financing Options for Co-occurring Services

Presentation to:
COSIG Leadership Workgroup
January 6, 2005

By: COCE/NDRI John O'Brien,



Overview of Presentation

- ★Administrative and Financing Issues re: Co-occurring Services
- **★ Discussion of Funding Streams**
- **★Pricing Co-occurring services**
- ★ Opportunities and Examples



Administrative and Financing Issues

- Lack of consensus of what AOD, MH and Medicaid are willing to buy
- ★Federal and state statutes/requirements don't allow agencies to blend funding
- ★Suspicion/reluctance to transfer dollars
- ★No clear agreement/process to track encounters or expenditures



Administrative and Financing Issues

- Lack of experience with each other's networks—although often they share providers
- *Agreeing upon program design and credentials for staff
- ★ Deciphering state practice acts that are important to other payers--QBHPs



Administrative and Financing Issues

- Changing provider reporting/billing practices
 - No requirements to report more than one diagnosis for most current services
 - Few incentives or tools to do additional (and accurate) program reporting



State General Revenue Constraints

- If separate AOD and MH state authorities different contracting, reimbursement, credentialing and monitoring requirements
- No new money—often seen as a separate initiative needing new dollars
- Issues with cost centers and ability of comingling of services and fund sources
- Rules/regulations that don't promote IGA that allow money to flow between agencies



State General Revenue Constraints

- Difficult to determine how has primary contracting and reimbursement responsibility (not our clients)
- ★ Create "siloing" effect in providers creating separate programs



State General Revenue Constraints

- ★ Potential Federal Funding Sources
 - SAPTBG
 - MHBG
 - Medicaid
 - TANF
 - Others



* SAPT and MH Block Grants

- Clear direction that block grants should be used to finance co-occurring services
- Block grant applications do not reflect directive
- Federal statutory/regulatory requirements have not changed to reflect this direction
- No specific exclusions
- States are very cautious re: mingling funds across block grants and other federal programs



- Medicaid
 - Will fund treatment and support services
 - Screening
 - Assessment
 - Outpatient
 - Individual
 - Family (including multi-family)
 - Group
 - Intensive Outpatient Services
 - Crisis Services
 - Methadone
 - ACT



- May Fund Residential Services—considerations:
 - Specifying the treatment and support components
 - Quantifying the treatment and support component per day, week or month
 - Historic and new Issues with IMD
 - Will not pay for watchful oversight
 - Will not pay for room and board
- Other limitations:
 - Education
 - Employment
- Services must be medically necessary and ensure:
 - Statewideness
 - Choice of any willing/qualified provider
 - Comparability of Services



State match is required for Medicaid – can not use other Federal funds (e.g. block grants).



Factors Influencing Pricing

- Identifying and understanding program costs for discrete programs—rates not related to costs will impact access
- Identifying specific enhancements to existing programs and associated state and provider costs:
 - Training/Orientation (state costs)
 - Effects on productivity of trainees (provider costs)
 - Retaining qualified providers/staff—making sure you provide incentives for continuing program fidelity
 - Costs of state certification/credentialing process



Factors Influencing Pricing

- ★ Number and qualification of staff
 - Staffing patterns
 - Expectations re: crisis response
 - Number and level of practitioner to ensure good risk management and payer qualifications
 - Medical oversight needed—how much?
 - Supervision requirements for nonlicensed/credentialed staff



Opportunities

- **★Joint Purchasing Among Agencies**
 - Different state agencies purchasing same service:
 - Development of a purchasing cooperative through and MOA
 - Standardized contracting
 - Standardized pricing
 - Expectation that state is payer of last resort



Example: Connecticut SA/MH Day Programs

- *Three agencies purchasing services:
 - DMHA
 - -DOC
 - Court Supported Services Division
- **★**Goals:
 - Common contracting
 - Rate setting
 - Financial Reporting



Example: Connecticut SA/MH Day Programs

* Results:

- One agency (DMHAS) will contract for cooccurring services for all three agencies
- CSSD, DOC and DMHAS developed contract— Domino's theory
- CSSD and DOC transfer funds quarterly to DMHAS
- DMHAS pays providers
- IGA specifies frequency/format for reporting



Example: Connecticut SA/MH Day Programs

*Critical foundation:

- Clear about the services that were going to be purchased
- Good cooperation and trust among participating agencies
- Clear protocol for identifying client payment responsibility



Opportunities

- ★Third Party Intermediary
 - Implements multi agency intents and policies
 - Makes decisions about the fund source that is used
 - Provides accountability to all payers
 - Addresses state issues that state agencies have regarding co-mingling of funds



Example: Michigan

- State has been focused on co-occurring issue for over 10 years
- *AOD authority issued a policy to respond to barriers identified relative to provision of services for co-occurring disorders:
 - Eligibility for services
 - Funding
 - Diagnosis
 - Encounter reporting



Example: Michigan

- Eligibility Standards for eligibility did not change. When a client meets MH or AOD eligibility criteria, services to address co-occurring disorder are covered.
- Funding State general MH funds, state AOD funds and Medicaid can be used to pay for services
- Diagnosis Presence or sequence of diagnosis not a factor in reimbursement
- * Encounter Reporting Demographic information from encounter reports assists state with outcomes measurement



Example: lowa

- Goal Not to add a third services tier (i.e., AOD, MH and co-occurring)
- * No new services or new rates
- Strategies for co-occurring services are aimed at the treatment level
- Encourage dually-accredited providers who will be deemed eligible to participate across systems
- Managed care plan regularly interface with providers at roundtables and association meetings to discuss case-specific issues



Opportunities

- ★Single state agency identified as lead:
 - Statutory/Regulatory authority for cooccurring
 - Has identified budget authority for cooccurring



Decisions

- Need a framework before you discuss financing:
 - Agreement on what you are buying:
 - Services
 - Competencies
 - Positions
 - Agreement on service requirements
 - Service activities
 - Agency requirements
 - Staff credentials
 - Staffing patterns
 - Hours of operation



Decisions

- * Agreement on rate or rate methodologies
 - Fee for Service
 - Grant
 - Case Rate
- * Affordability
 - What will it cost (include start up)
 - What will be the projected utilization (18-24 months)



Decisions

- ★ Identify funding sources do we have available
- ★ Identify how services will be purchased
- How will services be monitored and changed over time